

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

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APR - 5 2005

Federal Communications Commission
Office of Secretary

In the Matter of)

Amendment of Section 73.202(b),)

Table of Allotments,)

FM Broadcast Stations.)

(Richlands, Shallotte, Topsail Beach, and)

Wrightsville Beach, North Carolina))

MB Docket No. 05-16

RM-11143

To: The Office of the Secretary

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS OF SEA-COMM, INC.

Sea-Comm, Inc. ("Sea-Comm"), the licensee of primary commercial FM radio broadcasting stations WBNU, Shallotte, North Carolina, WBNE, Wrightsville Beach, North Carolina, and WWTB, Topsail Beach, North Carolina, hereby respectfully submits these Reply Comments in response to the Comments and Counterproposal of Conner Media Corporation (the "Counterproposal") that were filed in this proceeding on behalf of Conner Media Corporation ("Conner").¹

Conner's Counterproposal is flawed both procedurally and substantively and should be dismissed forthwith for the reasons set forth herein.

¹ Apart from Conner's Counterproposal, discussed herein, and Sea-Comm's own Comments that were filed on March 10, 2005, Sea-Comm is unaware of any other filings in this proceeding.

No. of Copies rec'd
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**Conner's Counterproposal Was Filed Out of Time
and Cannot Be Given Any Consideration**

Attached to these Reply Comments, as Appendix A, is a copy of the first page of Conner's Counterproposal as retrieved from the Commission's files in this proceeding by a document clerk employed by Sea-Comm's law firm. As the Commission can readily observe, the document bears a date stamp as "Received – FCC" on March 21, 2005 by the "Federal Communication [*sic*] Commission Bureau/Office."² However, the document also bears a date stamp as "Received" on March 29, 2005 by the "Federal Communications Commission Office of the Secretary."

The *Notice of Proposed Rule Making* in this proceeding, DA 05-76, adopted on January 26, 2005 and released on January 28, 2005, 20 FCC Rcd. ____, 70 Fed. Reg. 7220 (published on February 11, 2005) (the "*NPRM*") specified on more than one occasion that filings in this proceeding were to have been made with the Office of the Commission's Secretary and that comments and counterproposals were to have been filed by March 21, 2005. See *NPRM* at Para. 6; *NPRM*, Appendix at Para. 4. Section 1.7 of the Commission's Rules provides that

[u]nless otherwise provided in this Title, by Public Notice, or by decision of the Commission or of the Commission's staff acting on delegated authority, pleadings and other documents are considered to be filed with the Commission upon their receipt *at the location designated by the Commission*" (emphasis added).

In this case, the *NPRM* quite specifically required filings in this proceeding to be made with the Office of the Secretary, and specified that the deadline for filing comments and

² Someone unknown to Sea-Comm or its undersigned counsel apparently wrote a large "x" in handwriting over the stamp itself.

counterproposals was March 21, 2005. *Id.* Conner's Counterproposal was filed apparently with an unspecified Bureau or Office of the Commission on March 21, 2005, but was not received in the Office of the Commission's Secretary – the "location designated by the Commission," in the parlance of Section 1.7 – until March 29, 2005. As such, Conner's Counterproposal was "filed," for purposes of Section 1.7, eight days late and cannot be considered. *See* Section 1.420(d) of the Commission's Rules ("[c]ounterproposals shall be advanced in initial comments only . . ."); *NPRM*, at Appendix Paragraph 3(a); ³ *NPRM* at Appendix Para. 3(b); ⁴ *NPRM* at Para. 6; ⁵ *Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Cheboygan, Rogers City, Bear Lake, Bellaire, Rapid River, Manistique, Ludington, Walhalla, and Onaway, Michigan)*, 19 FCC Rcd. 3462, 3463 (Ass't. Chief, Audio Division, 2004) ("Section 1.420(d) of the Rules . . . requires a counterproposal to be filed by the comment date"). In fact, the Commission quite recently had occasion to remind interested parties, such as Conner, that filings in FM broadcast station channel allotment rule making proceedings are required to be made with the Office of the Secretary, not with any other Bureau or Office within the Commission, and that "[i]ncorrectly addressed filings will be treated as having been filed on the receipt date shown on

³ "Counterproposals advanced in this proceeding will be considered, if advanced in initial comments, . . . "

⁴ "Petitions for rule making which conflict with the proposals in this *Notice* will be considered as comments in the proceeding, and Public Notice to this effect will be given as long as they are filed before the date for filing initial comments herein. If they are filed later than that, they will not be considered in connection with the decision in this docket."

⁵ ". . . interested parties may file comments on or before March 21, 2005,"

the official ‘Office of the Secretary’ date stamp. Failure to follow these requirements may result in the treatment of a filing as untimely,” citing Section 1.7 of the Rules.⁶

In view of the foregoing, Conner’s Counterproposal must be treated as having been filed with the Commission on March 29, 2005, which renders the Counterproposal untimely and subject to no consideration, under the above-cited authorities.⁷

Conner’s Counterproposal Cannot Be Granted In Any Event

Conner’s Counterproposal requests relief which is not available under the Commission’s rules and policies. In effect, Conner is seeking either (i) to force Sea-Comm to change the community to which Station WWTB’s channel is allotted from Topsail Beach to Swansboro, North Carolina (the community preferred by Conner, though neither desired by Sea-Comm nor proposed in the *NPRM*), or (ii) to allot WWTB’s proposed new channel (Channel 281A) to Swansboro as a new allotment.⁸ Neither of those proposals is consonant with the Commission’s rules and policies.

⁶ See *Public Notice*, “Filing Requirements in FM Allotment Rulemaking Proceedings,” DA 05-995, released April 1, 2005 (copy attached hereto as Appendix B).

⁷ See also *Electri City, Inc. d/b/a KEMS Kewalo*, 19 FCC Rcd. 17500, 17501 (Chief, Public Safety and Critical Infrastructure Division, Wireless Telecommunications Bureau) (“... persons filing documents with the Commission must take care to ensure that their documents are filed at the correct location specified in the Commission’s Rules”).

⁸ The Counterproposal exhibits some internal confusion on Conner’s part as to whether it requests an involuntary community of license change for Sea-Comm’s Station WWTB or whether it requests a so-called “drop-in” allotment of Channel 281A as a new channel allotment to Swansboro. Compare Conner’s Counterproposal at p. 2 (“... Conner’s counterproposal, which preserves and enhances the benefit of the other changes proposed by Sea-Comm, while substituting the more deserving community of Swansboro for *the new Class A station*,” emphasis added) with *id.* at p. 5 (“... Conner proposes to improve upon Sea-Comm’s proposal *by moving WWTB on Channel 281A to the larger unserved* (continued...)”).

There is simply no authority under Section 1.420(i) of the Commission's Rules -- the regulation pursuant to which Sea-Comm submitted its Petition for Rule Making in this proceeding⁹ and pursuant to which the *NPRM* was issued¹⁰ -- for a counterproponent to submit an alternative community of license for the licensee or the permittee of a station seeking to invoke the provisions of that rule. Here, Sea-Comm has proposed a re-allotment of WWTB's proposed new channel, Channel 281A, from Topsail Beach to Richlands, North Carolina. Conner would prefer that Sea-Comm have proposed to re-allot WWTB's channel from Topsail Beach to Swansboro. But that is simply not Conner's decision to make; and there is no authority, and none cited in Conner's Counterproposal, for a third party, such as Conner, to force upon a Section 1.420(i) rule making proponent, such as Sea-Comm, an involuntary change in the latter's station's community of license in which the proponent has no interest, such as Swansboro. In fact, the Commission's policy is not to countenance such counterproposals. *See Petition for Rule Making filed by H. P. Rowley, III*, 11 FCC Rcd. 12688 (Chief, Policy and Rules Division, 1996) ("... in adopting ... [the Section 1.420(i)] procedure, the Commission did not suggest, in any way, that this procedure could be used by a third party ... to change the community of license of an existing station"); *Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Greenville, Texas)*, 6 FCC Rcd. 6048 (Chief, Allocations Branch, 1991) ("[t]here is nothing in ... [the *Report and Order* adopting Section 1.420(i)] to

(...continued)

city of Swansboro rather than Richlands, . . . ;" emphasis added), and with *id.* at p. 10 ("Conner hereby states its present intention to apply for . . . the *new station* it proposes at Swansboro . . . ;" emphasis added).

⁹ See Sea-Comm's Petition for Rule Making, filed on April 12, 2004.

¹⁰ *NPRM*, at Para. 1.

suggest that this procedure is intended to be used by third parties as a means to change the community of license of another party's station").

Conner's Counterproposal also fails for the simple reason that as a so-called "drop-in" allotment, *i.e.*, the allotment of Channel 281A to Swansboro as a new channel allotment, the allotment would not be adequately spaced from WWTB's licensed antenna site. *See* Appendix C to these Reply Comments, the Technical Statement of Jefferson G. Brock of Graham Brock, Inc. in St. Simon's Island, Georgia, Sea-Comm's consulting broadcast engineer, dated March 30, 2005. Mr. Brock's Technical Statement concludes that ". . . Channel 281A at Swansboro, North Carolina would not meet the Commission's minimum distance separation requirements to the licensed site of WWTB, Channel 280C3, Topsail Beach, North Carolina,"

It is well settled that a proposal for a channel allotment under Section 73.202(b) must specify appropriate separations from pertinent co-channel and adjacent-channel stations. *See* Section 73.207(a) of the Commission's Rules ("Except for assignments made pursuant to § 73.213 or 73.215, FM allotments . . . must be separated from other allotments and assignments on the same channel (co-channel) and five pairs of adjacent channels by not less than the minimum distances specified in . . . this section"). Specifically, Section 73.207(b)(1) of the Commission's Rules requires a separation between WWTB's licensed site on Channel 280C3 and the proposed allotment of a drop-in Channel 281A at Swansboro of 89 kilometers. Mr. Brock's Technical Statement establishes that the actual separation would depart from the requirements of Section 73.207(b)(1) by 57.57 kilometers (Appendix C, Exhibit # 1). This alone is fatal to Conner's Counterproposal. *See, e.g., Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Chillicothe and Ashville, Ohio)*, 17 FCC Rcd. 20418, 20419

(Ass't. Chief, Audio Division, 2002) (“... Section 73.207(a) specifically prohibits us from accepting petitions to amend the Table of Allotments which do not meet all of the minimum separation requirements”); *accord*, *Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Worcester and Westborough, Massachusetts)*, 18 FCC Rcd. 23750, 23751 n. 7 (Ass't. Chief, Audio Division, 2003) (“... Section 73.207(a) of the Rules provides that ‘[t]he Commission will not accept petitions to amend the Table of Allotments unless the reference points meet all of the minimum distance separation requirements of this section’”).

Thus, whether considered as an attempt to force Sea-Comm involuntarily to change WWTB's community of license to Swansboro – a community in which Sea-Comm has no interest – or as an attempt to allot Channel 281A to Swansboro as a new allotment, Conner's Counterproposal fails.

As a related matter, and as a final reason for rejecting Conner's Counterproposal, there is no party that is both able and willing to apply for Channel 281A at Swansboro. As discussed earlier, Conner cannot prevail in seeking the allotment of Channel 281A to Swansboro as a new channel allotment, because that proposal fails to meet the minimum distance separation requirements of Section 73.207(b)(1). Hence, Conner itself is not eligible to commit to applying for a construction permit for a new station that would operate on a channel that cannot be allotted to Swansboro. For its part, Sea-Comm is not interested in the re-allotment of WWTB's channel – either the existing allotment on Channel 280C3 at Topsail Beach or the proposed downgrade, channel substitution, and re-allotment on Channel 281A at Richlands – to Swansboro and specifically disavows any intention of applying for a re-allotted Channel 281A at Swansboro. That, by itself, is sufficient to render the Counterproposal unacceptable for filing. *See, e.g.,*

Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Llano and Marble Falls, Texas), 12 FCC Rcd. 6809, 6811 (Chief, Allocations Branch, 1997) (“[i]n the absence of . . . a commitment [by the proponent of a channel allotment to apply for a construction permit to build and operate a new FM radio station on the proposed channel, if allotted], we will not allot . . . [the channel] . . .”).

Preferential Arrangement of Allotments

For the reasons hereinbefore stated, Conner’s Counterproposal is fatally flawed, both as a matter of procedure and on its substance. Consequently, Sea-Comm respectfully submits that the Counterproposal does not deserve significant analysis on its merits. Nonetheless, to the extent that the Counterproposal purports to find flaws in Sea-Comm’s so-called “*Tuck*” presentation¹¹ on the issue of Richlands’ independence from the Jacksonville, North Carolina Urbanized Area, a brief reply may be in order. While Sea-Comm stands behind its *Tuck* presentation in its Petition for Rule Making, and believes that the Commission in the *NPRM* has effectively found that presentation sufficient to support the re-allotment of WWTB’s channel to Richlands as that community’s first and only local aural transmission service,¹² Sea-Comm would hasten to remind the Commission that an alternative and entirely independent basis exists for finding that the proposed re-allotment would result in a preferential arrangement of allotments for purposes of Section 1.420(i). That basis is the finding, also reflected in the *NPRM*, that as a result of the re-allotments of the channels currently occupied by Sea-Comm’s Stations WWTB, WBNU, and

¹¹ *Faye & Richard Tuck, Inc.*, 3 FCC Rcd 5374 (1988).

¹² *E.g.*, *NPRM* at Para. 3 (“This proposal . . . warrants consideration because it could provide Richlands with its first local aural transmission service . . .”).

WBNE, there would be a net gain of persons served by the three stations of over 135,000 people.

¹³ That fact alone justifies a finding that the re-allotments would result in a preferential arrangement of allotments, under Priority 4 (“other public interest matters”) of the Commission’s FM channel allotment priorities. ¹⁴


Conclusion

For the reasons set forth above, Sea-Comm respectfully urges the Commission promptly to dismiss as defective Conner’s Counterproposal and to adopt a *Report and Order* in this proceeding at the earliest practicable date that will be consistent with the *NPRM*.

Respectfully submitted,

SEA-COMM, INC.

By:


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W. Ray Rutngamlug
Its Attorneys

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April 5, 2005

¹³

Id.

¹⁴

Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).

APPENDIX A

DOCKET FILE COPY DUPLICATE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAR 21 2005

Federal Communication Commission
Bureau / Office

In the Matter of)

Amendment of Section 73.202(b),)

Table of Allotments,)

FM Broadcasting Stations,)

(Richlands, Shallotte, Topsail Beach, and)

Wrightsville Beach, North Carolina))

MB Docket No. 05-16

RM-11143

RECEIVED

MAR 29 2005

To: Assistant Chief, Audio Division, Media Bureau

Federal Communications Commission
Office of the Secretary

COMMENTS AND COUNTERPROPOSAL OF
CONNER MEDIA CORPORATION

Conner Media Corporation ("Conner"), by its attorney, pursuant to Sections 1.415, 1.419 and 1.420 of the Commission's rules, hereby submits its comments and a counterproposal in the captioned matter.

INTRODUCTION

The Commission's *Notice of Proposed Rulemaking* herein, DA 05-76, released January 28, 2005 ("NPRM") was initiated by a Petition for Rulemaking ("Petition") filed by Sea-Comm, Inc. ("Sea-Comm") and proposed the following changes in three of Sea-Comm's stations: (a) WBNU would move from Channel 279C3 at Shallotte, North Carolina to Channel 279C2 at Wrightsville Beach, North Carolina; (b) WBNE would move from Channel 229A at Wrightsville Beach, North Carolina to Channel 229C3 at Topsail Beach, North Carolina; and (c) WWTB would move from Channel 280C3 at Topsail Beach, North Carolina to Channel 281A at Richlands, North Carolina. The net result would be a substitution of Class C3 stations at Topsail Beach; an upgrade from Class A to Class C2 at Wrightsville Beach; the loss of a Class C3 station

APPENDIX B



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 05-995

Released: April 1, 2005

FILING REQUIREMENTS IN FM ALLOTMENT RULEMAKING PROCEEDINGS

The Audio Division, Media Bureau, issues this reminder regarding filing requirements for rulemaking proceedings to amend the FM Table of Allotments, 47 C.F.R. §73.202(b). In recent months, numerous petitions, counterproposals and comments have been improperly filed in these proceedings. Typically, these filings have been incorrectly addressed to the Media Bureau or the Audio Division, thereby delaying their receipt in the Office of the Secretary and their prompt entry into in the Commission's Electronic Comment Filing System ("ECFS").

As stated in each FM allotment Notice of Proposed Rulemaking, all filings in these proceedings are to be addressed to Marlene H. Dortch, Secretary, Federal Communications Commission, Office of the Secretary, and addressed for delivery, as appropriate, to the addresses established by the Secretary for hand delivered, commercial overnight mail, and United States Postal Service-delivered filings. *See* Public Notice, *Reminder, Filing Locations for Paper Documents and Instructions for Mailing Electronic Media*, 18 FCC Rcd 16705 (2003); <http://www.fcc.gov/osec>. The first page and cover sheet of each filing must indicate "To: Office of the Secretary." Incorrectly addressed filings will be treated as having been filed on the receipt date shown on the official "Office of the Secretary" date stamp. Failure to follow these requirements may result in the treatment of a filing as untimely. *See* 47 C.F.R. § 1.7.

By: Chief, Audio Division

Contact: William F. Caton, Deputy Secretary, Office of the Secretary, william.caton@fcc.gov,
202-418-0304.

Victoria M. McCauley, Audio Division, Media Bureau, victoria.mccauley@fcc.gov,
202-418-2180.

[FCC]

APPENDIX C

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

REPLY COMMENTS
MB DOCKET #05-16
SEA-COMM, INC.
ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
March 2005

TECHNICAL EXHIBIT

Copyright 2005

REPLY COMMENTS
MB DOCKET #05-16
SEA-COMM, INC.
ALLOT CHANNEL 279C2
WRIGHTSVILLE BEACH, NORTH CAROLINA
ALLOT CHANNEL 229C3
TOPSAIL BEACH, NORTH CAROLINA
ALLOT CHANNEL 281A
RICHLANDS, NORTH CAROLINA
March 2005

TECHNICAL STATEMENT

This technical statement and attachments were prepared on behalf of Sea-Comm, Inc. ("Sea-Comm"), the Petitioner in MB Docket #05-16. In MB Docket #05-16, Sea-Comm has requested the downgrade of Channel 280C3 at Topsail Beach, North Carolina to Channel 281A, and the re-allotment of the channel to Richlands, North Carolina as that community's first local service. Connor Media Corporation ("CMC") requested the upgrade of its station, WZUP, LaGrange, North Carolina from Channel 284C3 to Channel 284C2. To accommodate this proposal, CMC requests that Channel 281A be allotted to Swansboro, North Carolina.

As indicated on Exhibit #1 to this Technical Statement, Channel 281A at Swansboro, North Carolina would not meet the Commission's minimum distance separation requirements to the licensed site of WWTB, Channel 280C3, Topsail Beach, North Carolina, as well as to the proposed allotment of Channel 281A at Richlands, North Carolina. CMC's proposal for Swansboro fails to meet the required spacing distance to the licensed facility for WWTB. Further, CMC has not proposed a

replacement channel for WWTB at Topsail Beach, North Carolina. As such, Channel 281A cannot be allotted to Swansboro, North Carolina. Further, Sea-Comm did not propose, nor does it have any interest in, a Channel 281A allotment at Swansboro, North Carolina.

The foregoing statement was prepared on behalf of Sea-Comm, Inc., by Graham Brock, Inc., its Technical Consultants. All information is true and accurate to the best of our belief and knowledge. All data relating to FM facilities and proposals was extracted from the FCC's CDBS database. We assume no liability for error or omissions in that database.

EXHIBIT #1

Clearance study for Swansboro, North Carolina
Using site proposed by Conner Media as reference

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REFERENCE                                     DISPLAY DATES
34 42 41 N                                CLASS = A          DATA 03-30-05
77 16 07 W                                Current Spacings    SEARCH 03-30-05
----- Channel 281 - 104.1 MHz -----

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Call	Channel N. Lat.	Location W. Lng.	Ant	Dist Power	Azi HAAT	FCC	Margin
RADD	ADD 281A 34 42 41	Swansboro 77 16 07		NC 0.00 6.000 kW	0.0 100 M	115.0	-115.00
	Connor Media Corporation						
RADD	ADD 281A 34 49 40	Richlands 77 27 30		NC 21.64 6.000 kW	306.8 100 M	115.0	-93.36
	Sea-Comm, Inc.						
RDEL	DEL 280C3 34 29 38	Topsail Beach 77 29 18		NC 31.43 25.000 kW	219.8 100 M	89.0	-57.57
	Sea-Comm, Inc.						
WWTB	LIC-N 280C3 34 29 38	Topsail Beach 77 29 18	NCN	NC 31.43 21.500 kW BLH-19930920KF	219.8 100 M	89.0	-57.57
WCXL	LIC 281C1 36 08 08	Kill Devil Hills 75 49 28	CX	NC 205.34 100.000 kW BLH-20040324AER	39.2 296 M	200.0	5.34
	Max Radio Of The Carolinas						
WYAV	LIC 281C1 33 35 27	Myrtle Beach 79 02 55	CN	SC 205.90 100.000 kW BLH-19980731KA	233.2 299 M	200.0	5.90
	NM Licensing, LLC						
WZUP.A	APP 284C3 35 15 31	La Grange 77 36 33	CX	NC 68.20 18.200 kW BMPH-20050204ACU	333.1 76 M	42.0	26.20
	Conner Media Corporation						
WFXK	LIC 282C1 36 02 22	Tarboro 78 03 44	CN	NC 164.04 100.000 kW BLH-19900209KD	334.3 299 M	133.0	31.04
	Radio One Licenses, LLC						
WZUP.C	CP 284C3 35 16 02	La Grange 77 49 09	CX	NC 79.55 25.000 kW BPH-20030203AFT	321.1 100 M	42.0	37.55
	Conner Media Corporation						
WZUP	LIC-N 284A 34 51 48	Rose Hill 78 02 16	NCN	NC 72.38 2.800 kW BLH-19930128KB	283.7 78 M	31.0	41.38
	Conner Media Corporation						
RADD	ADD 279C2 33 59 56	Wrightsville Beach 77 54 35		NC 98.61 50.000 kW	216.8 150 M	55.0	43.61
	Sea-Comm, Inc.						

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Sea-Comm, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 30th day of March, 2005.

Jefferson G. Brock
Affiant

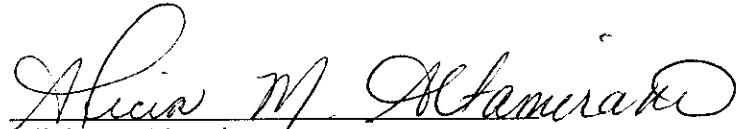
*Sworn to and subscribed before me
this the 30th day of March, 2005*

Notary Public, State of Georgia
My Commission Expires: September 3, 2007

CERTIFICATE OF SERVICE

I, Alicia M. Altamirano, a secretary in the law firm of Paul, Hastings, Janofsky & Walker, LLP, do hereby certify that I have on this fifth day of April, 2005, caused a copy of the foregoing **REPLY COMMENTS OF SEA-COMM, INC.** to be sent to the following by first-class United States mail, postage prepaid:

Peter Gutmann
Womble, Carlyle, Sandridge & Rice
1401 Eye Street, N.W.
Seventh Floor
Washington, D.C. 20005
Counsel to Conner Media Corporation


Alicia M. Altamirano